

ENFORCEMENT SENSITIVE

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"RCRA/TSCA"
"Permits Team"REVISION 4
Feb. 1994

Facility Name BEI-PIER 91
Facility ID No. WAD 00812917
Date 12/10/96 Ranked by S. SAFIOLIS Concur. _____ (Supv.)
Date _____ Concur. _____
(other Agency)

APPENDIX 1

Facility Environmental Priority Ranking Criteria

POINTS (circle the appropriate answer)

The first three categories should be summed separately to give the overall environmental priority ranking. Categories 4-9 should be summed to give guidance as to how to manage corrective action at that facility, e.g., degree of oversight appropriate. Each category should be evaluated separately and independently from the other categories. For facilities where information is lacking, use best scientific judgement in assessing a rating.

Category 1: Extent of Contamination

- 10 pts. Level 1A: Current or imminent groundwater contamination or extensive contamination of other media has been identified or is suspected.
- 5 pts. Level 1B: Moderate soil contamination exists, or is suspected, but with low potential to affect ground or surface waters or air; or extensive contamination exists, but stabilization measures are in place.
- 0 pts. Level 1C: Little or no contamination exists.

Category 2: Toxicity of Known or Suspected Releases

- 10 pts. Level 2A The known or suspected release constituents remaining in place, or any known or likely degradation products, contain hazardous substance factor values of:
100 or greater for human toxicity, or
100 or greater for ecotoxicity
- 5 pts. Level 2B The known or suspected release constituents remaining in place, and all known or likely degradation products, contain hazardous substance factor values of:
10 or less for human toxicity, and
10 or less for ecotoxicity
- 0 pts. Level 2C The release contains wastes that exhibit only the characteristics of ignitability, corrosivity, or reactivity and/or are non-hazardous wastes; or the waste (any type) has been entirely removed.

Other factors that contribute to increased toxicity or risk associated with waste constituents may be considered to increase the Category 2 score.

Ecotoxicity factors that result entirely from an environment that does not occur at or near the site need not be considered. For example, marine

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organism toxicity need not be considered at an inland site with no transport pathways to a marine environment.

Trace, byproduct and degradation constituents must be considered. For example, dioxin may be present in association with pentachlorophenol and other chlorinated phenols, and vinyl chloride is a likely degradation product of many chlorinated compounds.

Category 3: Facility Setting

- 10 pts Level 3A: The facility directly or has a high potential to affect sensitive bio-receptors or endangered species and/or human populations (e.g., air emissions, drinking water, surface water, wetlands).
- 5 pts Level 3B: The facility has low to moderate potential to affect sensitive bio-receptors or endangered species and/or human populations (e.g., air emissions, drinking water, surface water, wetlands). Ground water and/or surface water is used, or is potentially useable for drinking water.
- 0 pts Level 3C: The facility is removed from human populations and sensitive ecosystems. Ground water and/or surface water is not used for drinking water, nor does it have potential for drinking water use.

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TOTAL POINTS, Categories 1-3 Use the High, Medium, or Low for CA075 rank in RCRIS
25-30 points: High priority site
15-20 points: Medium priority site
0-10 points: Low priority site

Category 4: Enforcement History:

- 2 pts. Level 4A: There is a high level of concern regarding the facility's enforcement history (i.e., Class I violations).
- 1 pt. Level 4B: There is a medium level of concern regarding the facility's enforcement history (i.e., Class II violations).
- 0 pts. Level 4C: There is a low level of concern concerning the facility's enforcement history (i.e., minor or no violations).

Category 5: Financial Status of the Facility:

- 2 pts. Level 5A: There is a high level of concern regarding the facility's financial status (i.e., bankruptcy suspect or business is for sale).
- 1 pt. Level 5B: There is a medium level of concern regarding the facility's financial status (i.e., facility appears solvent but has not adequately demonstrated financial assurance).
- 0 pts. Level 5C: There is a low level of concern concerning the facility's financial status (i.e., facility has demonstrated financial assurance).

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Category 6: Extent to Which the Nature of Releases is Known:

- 2 pts. Level 6A: Little or no site characterization has been completed.
- 1 pt. Level 6B: Some site characterization has been completed but a lot more work must be performed.
- 0 pts. Level 6C: Substantial site characterization has been completed.

Category 7: Level of Public Interest:

- 2 pts. Level 7A: There is substantial public interest in the site.
- 1 pt. Level 7B: There is some public interest in the site.
- 0 pts. Level 7C: There is little to no public interest.

Category 8: Type and Complexity of the Particular Corrective Action Activity:

- 2 pts. Level 8A: There are complex and significant corrective action activities being performed (such as drum removal or installation of a groundwater pump and treat system).
- 1 pt. Level 8B: There are corrective action activities "average" in complexity and significance being performed (such as well installation or pump tests).

0 pts. Level 8C: There are relatively simple and insignificant activities being performed at the site (such as installation of a fence).

Category 9: Capability of Facility to Conduct Corrective Action Activities

- 2 pts. Level 9A: There is a high level of concern regarding the facility's ability to conduct corrective action activities (i.e., facility owner/operator or facility consultant has no experience in hazardous waste remediation).
- 1 pt. Level 9B: There is a medium level of concern regarding the facility's ability to conduct corrective action activities (i.e., facility owner/operator or consultant has an "average" level of experience and capability).
- 0 pts. Level 9C: There is a low level of concern concerning the facility's ability to conduct corrective action activities (i.e., the facility owner/operator has a reputation of doing good hazardous waste remedial work or has hired a highly respected consultant in this field).

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TOTAL POINTS, Categories 4-9

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